

Exhibit 7

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STEVEN E. GREER, MD
an individual.

Plaintiff,

-against-

Dennis Mehiel, an individual, Robert Serpico, an individual, The Battery Park City Authority, a New York State authority, Howard Milstein, an individual, Steven Rossi, an individual, Janet Martin, an individual, Milford Management, a New York Corporation, and Mariners Cove Site B Associates, a New York corporation.

Defendants.

CONFIDENTIAL

DEPOSITION OF ROBERT MICHAEL SERPICO
New York, New York
March 21, 2017

Reported by:
Pessi Goldstein
JOB NO. 121382

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2 A P P E A R A N C E S:

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4 STEVEN E. GREER, MD
5 Plaintiff Pro Se

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7 SHER TREMONTE
8 Attorneys for Defendants
9 Robert Michael Serpico
10 Battery Park City Authority
11 80 Broad Street
12 New York, NY 10004
13 BY: MICHAEL TREMONTE, ESQ.
14 MICHAEL GIBALDI, ESQ.

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17 ROSENBERG & ESTIS
18 Attorneys for
19 Remaining Defendants
20 733 Third Avenue
21 New York, NY 10017
22 BY: DEBORAH RIEGEL, ESQ.

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17 ALSO PRESENT:

18 ALIX S. PUSTILNIK
19 General Counsel for BPCA

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3 S T I P U L A T I O N S

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5 IT IS HEREBY STIPULATED AND
6 AGREED by and between the attorneys for the
7 respective parties herein, that filing,
8 sealing and certification be and the same
9 are hereby waived.

10 IT IS FURTHER STIPULATED AND
11 AGREED that all objections, except as to the
12 form of the question shall be reserved to
13 the time of the trial.

14 IT IS FURTHER STIPULATED AND
15 AGREED that the within deposition may be
16 signed before any Notary Public with the
17 same force and effect as if signed and sworn
18 to before the Court.

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2 so the notion that it was ruled not
3 permissible by discovery is completely
4 impossible. This is a new document
5 that just arose.

6 Okay. So, we'll take that up
7 with the judge, okay.

8 Q. Now, have you ever had personal
9 meetings with Steve Rossi in the
10 neighborhood, in the nature of coffee, let's
11 grab coffee, that sort of thing?

12 MR. TREMONTE: Objection to form.

13 A. Yes.

14 Q. How many times in the last three
15 years do you estimate you've met Steve Rossi
16 in person?

17 A. I don't know a count but I would
18 average, on an average maybe once every four
19 months or so, thereabouts, sometimes it was
20 back-to-back, then we wouldn't see each
21 other for months. I would say average about
22 once every four months or so.

23 Q. And those meetings have been
24 going on for how many decades?

25 MR. TREMONTE: Objection.

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2 A. Steve and I know each other for a
3 long time so we have been meeting regularly
4 for a long time, decades, I don't know if it
5 goes back to the '80s but --

6 Q. Were you present --

7 MR. TREMONTE: Please let the
8 witness finish his testimony.

9 Q. Was he present for your 2016
10 going away party at Pier A?

11 MR. TREMONTE: Objection to form.

12 A. I don't remember seeing him. If
13 he showed up, it was for a brief moment but
14 I don't remember seeing him that night.
15 Maybe he was, I couldn't, I forgot, I don't
16 know.

17 Q. Did you take a photograph with
18 him with your arm around him?

19 MR. TREMONTE: Objection.

20 A. If he was there, chances are,
21 yes.

22 MR. TREMONTE: Hold on, you've
23 got to let me make my objection. You
24 are getting perilously close to being
25 beyond the scope of permissible

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2 actual nitty-gritty making a decision, there
3 were some concerns internally.

4 Q. And what were those concerns?

5 A. The concerns, my understanding of
6 the concerns internally were that you were
7 abusive to intern staffs and you were
8 intimidating and you were using bad language
9 and ad hominem attacks and you were abusing
10 staff when you called in and didn't get the
11 answers you want. So that was a concern I
12 know internally and that may have fostered
13 the decision.

14 Q. Do you have any voicemail or
15 audio recordings of that alleged behavior of
16 mine?

17 MR. TREMONTE: Objection to form.

18 A. No, but I have firsthand
19 knowledge, I mean Seema Singh, I work
20 closely with her, she was senior counsel,
21 and Seema Singh was acting general counsel
22 at one point. And right after she got off
23 the phone with you, I was with her and she
24 was visibly upset because you had called her
25 a word I won't even use, in language, but it

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2 began with a C and end with a T, and it was
3 extremely disparaging and extremely
4 upsetting to her as a female attorney and
5 that was typical of language used with other
6 staff at the Authority so --

7 Q. And this is based on testimony
8 but you don't have any --

9 A. Right, when she hung up the phone
10 she was visibly upset, yes.

11 MR. TREMONTE: Hold on, hold on.

12 Objection, number one, you have to let
13 the witness answer the question you put
14 to him. And number two, to the extent
15 that you are making comments that are
16 not questions about his testimony, I
17 would move to strike those as
18 superfluous and harassing.

19 Q. On July 29 of 2015, you had a
20 public board meeting. I was once again not
21 allowed in and I was sent to what I best,
22 they described as a video overflow room down
23 at 21 West Thames or where the old PEP
24 offices were. Are you aware of, when I use
25 the word "video overflow room," and so